

**PC SCAN**

UNITED STATES DISTRICT COURT FOR THE NORTHERN  
DISTRICT OF ILLINOIS, EASTERN DIVISION

William D. Riley EL  
Plaintiff

Case No. 15 CV 11180

**FILED**

JN

vs.

Honorable Judge John Z. Lee

5/28/2019

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Salvador Godinez et.al.,  
Defendants.

Magistrate Judge Young B. Kim

PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION  
FOR SUMMARY JUDGMENT

Now comes Plaintiff, William D. Riley EL, pro SE, and pursuant to Fed. R. Civ. P. 56, humbly requesting this court for an order denying Defendants Motion for Summary Judgment. In support thereof, Plaintiff state the following:

1. Plaintiff, William D. Riley EL ("Plaintiff") is an inmate in the custody and control of the Illinois Department of Corrections ("IDOC") at Stateville Correctional Center ("Stateville").

2. Plaintiff brought this lawsuit pursuant to 42 U.S.C. § 1983 alleging multiple incidents of retaliation, consisting of three counts, in violation of Plaintiff's First Amendment rights, against current and former employees of the IDOC. Specifically, Plaintiff believes that Defendants conspired to engage in a pattern and practice of harassment, by issuing false disciplinary reports, strip searches, bogus transfer, confiscation and loss of all Plaintiff's property, and the arbitrary placement of Plaintiff in administrative detention in retaliation for prior grievances/complaints, and lawsuits Plaintiff filed against prison administration.

3. The evidence shows that Defendants actions were motivated by Plaintiff's prior and continuance speech, which caused Plaintiff to suffer a deprivation likely to deter future First Amendment activity.

4. In addition, the evidence shows that all of the Defendants acted with unreasonable, and retaliatory purposes; therefore, Plaintiff has demonstrated that the alleged deprivations would not have occurred in the absence of his prior and continuance protected activity.

5. Accordingly, the Defendants are not entitled to judgment as a matter of law as to all claims against them in Plaintiff's Amended Complaint. See Plaintiff Memorandum of Law in Support of his Response to Defendants Motion for Summary Judgment.

WHEREFORE, based on the foregoing, as well as the facts set forth in Plaintiff's supporting Memorandum of Law, Plaintiff respectfully request that this Honorable Court enter an order denying Defendants motion for summary judgment, and grant any such further relief that the Court deems necessary and just.

Respectfully submitted,  
[All Right Reserved, UCC 1-308/1-207]

William D. Riley EL

William D. Riley EL

BO3069 STA. C.C.

P.O. Box 112

Joliet, Illinois [60434-0112]